



Law Offices Of  
**Wolodymyr M. Starosolsky, Esq.**

225 Broadway - Suite 1803

New York, NY 10007

Tel: (646) 256-8058 Fax (212) 406-3677



May 25, 2012

Douglas E. Fleming III, Esq.  
Skadden, Arps, Slate Meagher & Flom LLP and Affiliates  
Four Times Square  
New York, NY 10036

Re: State Farm Mutual Automobile Insurance Co. v. Accurate Medical P.C., et. al.,  
Case No. 1:07 civ 00051 (ENV) (MDG) Case Closed on 06/12/08

Dear Mr. Fleming:

I ask that you stipulate to withdraw or to have stricken, from all your filings submitted to the Court, any mention, reference and/or documents implicating my defendant-clients, the Pawlowski parties, in any misconduct as such is not relevant to the court's disposition of this proceeding. Pursuant to the authority stated in *Precision Instrument Mfg. Co. v. Automotive Maintenance Mach. Co.* 324 U.S. 806, 814, 65 S. Ct. 993, 89 L.Ed. 1381 (1945), *Loughran v. Loughran*, 292 U.S. 216, 229; *Keystone Driller Co. v. General Excavator Co.*, 290 U.S. 240, 245; *Johnson v. Yellow Cab Co.*, 321 U.S. 383, 387; and, 2 Pomeroy, *Equity Jurisprudence* (5th Ed.) §§ 379-399, such scurrilous attacks on my clients' character are inflammatory, irrelevant and improper. Certainly, you and Ms. Birnbaum must be aware of this fact. You should therefore apologize for this to the Court, to my clients.

Your cooperation in this matter will be greatly appreciated.

Very truly yours,

  
Wolodymyr M. Starosolsky

WMS/jl

Cc:

Steven R. Talan, Esq.  
Blodnick Fazio & Associates, P.C.  
Counsel for the Elzanaty Parties  
1325 Franklin Ave, Suite 555  
Garden City, New York 11530